

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Louis J. Wolverton	:	
209 Thrush Court	:	
Bushkill, PA 18324	:	CIVIL ACTION 22-cv-02832
	:	
Plaintiff,	:	
	:	
v.	:	JURY DEMAND
	:	
Travel + Leisure Co.	:	
f/k/a Wyndham Destinations, Inc.	:	
Orlando office 6277 Sea Harbor Drive	:	
Orlando, FL 32821.	:	
	:	
Defendant.	:	

**PLAINTIFF’S MOTION TO TRANSFER
MATTER TO THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AND NOW, comes Plaintiff, Louis Wolverton, by and through his undersigned counsel, and files this Motion to Transfer Matter to the United States District Court for the Middle District of Pennsylvania, and in support thereof avers as follows:

1. Plaintiff initiated this action on July 20, 2022, to seek redress for violations of reverse race discrimination in violation of 42 U.S.C. § 1981.
2. The correct venue for this matter, as set forth in the caption, is the United States District Court for the Middle District of Pennsylvania.
3. Due to a clerical error in the office of Plaintiff’s counsel, this matter was inadvertently filed in the United States District Court for the Eastern District of Pennsylvania.

4. Plaintiff now wishes to transfer this action to the Middle District.
5. Plaintiff has not served the complaint on Defendant.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant this motion and enter an Order transferring this action to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

KOLMAN LAW P.C.

By: /s/ Timothy M. Kolman,
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July 28, 2022